EXHIBIT E19

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
DEPARTMENT NER HON. C. EDWARD SIMPSON, JUDGE

LAOSD ASBESTOS CASES, Coordinated Proceeding Special Title (Rule 3.550)	ASBESTOS No. JCCP 4674
TINA HERFORD and DOUGLAS HERFORD, Plaintiffs,	
vs.	No. BC646315
AT&T CORP., a subsidiary of AT&T INC. and its subsidiary PACIFIC BELL TELEPHONE COMPANY, et al., Defendants.	

REPORTER'S TRANSCRIPT OF PROCEEDINGS
WEDNESDAY; OCTOBER 25, 2017
A.M. SESSION

(APPEARANCES, NEXT PAGE.)

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IRENE KUBERT, CSR, CRR, RMR
Court Reporter Pro Tempore
License No. 10105

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M A S T E R I N D E X

OCTOBER 25, 2017; A.M. SESSION

CHRONOLOGICAL/ALPHABETICAL INDEX OF WITNESSES

EXHIBITS

OCTOBER 25, 2017; A.M. SESSION

CASE NUMBER: BC464315
CASE NAME: HERFORD VS. AT&T
PASADENA, CALIFORNIA WEDNESDAY, OCTOBER 25, 2017
DEPARTMENT NER HON. C. EDWARD SIMPSON, JUDGE
REPORTER: IRENE KUBERT, CSR NO. 10105
TIME: A.M. SESSION
APPEARANCES: (AS HERETOFORE NOTED.)

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(At 9:07 a.m. the following proceedings were held in open court out of the presence of the jury:)

THE COURT: Good morning.

(A chorus of "good mornings" was heard.)

THE COURT: What do we have planned for us this morning?

MR. PANATIER: We're going to call Dr. William Longo live. He's here. And then in the afternoon we have our treating surgeon, who is going to come hopefully right at 1:30. And if Dr. Longo is still going, we would like to interrupt that testimony to call the surgeon; and then Dr. Longo will finish.

THE COURT: Okay. I think we're ready.

MR. BENOFF: Your Honor, before they come in, just some follow-up issues related to motions in limine on Dr. Longo.

THE COURT: No, you should have brought those up

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.1 percent, you most -- you would not be able to say there was anything present.
Q. Okay. All right. And then so I called it a microscope, but XRD isn't actually a microscope.
A. No. I was going to correct you, but I didn't know if I should or not.
Q. Well, I corrected myself. So that's not a microscope, but it is an analytical tool?
A. It is an analytical tool. But not being a microscope, you can say there's tremolite there but you don't know the morphology because it's not a microscope.
Q. And then polarized light microscopy or just light microscopy in general -- what can we do with that as it pertains to something like asbestos?
A. Typically polarized light microscopy in asbestos is for what we call bulk samples. These are -- you take a piece of a ceiling tile and you send it to our lab or one of the other labs that are certified to do this. And they'll pick it apart, and they'll be picking little fiber materials that they can see in the bulk sample and put it in the polarized light.
By changing the direction of the light and polarization, you can get these asbestos fibers to turn colors and lose colors, depending on what you're doing -- you can use refractive index oils -- and determine exactly what asbestos it is.
So you can say, yes, it's one of the different asbestos -- regulated asbestos, and this is

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approximately how much.
Q. Does light microscopy have any limitations when it comes to looking for asbestos in a sample?
A. Yes, because it uses light.
Q. And what are those limitations?
A. It can't resolve by polarized light. It can resolve things smaller than the wavelength of light. And when you polarize it -- and that's the key here, to see the color changes, is to do the polarization -- is very limited on looking at smaller and smaller-sized bundles and fibers of asbestos.
So you can only see the very biggest bundles. You can't see individual fibers or resolve them to where you can analyze what it is. You can maybe see it. But to get the polarization and the dispersion staining that they do, you have to have a certain thickness of fiber. And that's the problem with it.
Q. What approximately is the thickness of the fiber that a light microscope can see?
A. To see, you can see down to .25 micrometers, but you're not -- it's not just seeing. You've got to do the different polarizations to be able to see the color changes. And there you have a problem because you can't -- you might be able to see the fiber, but you can't identify it.
So you have to have approximately a half a micron, maybe up to a micron in size, depending on how good your PLM scope is. So any single fibers will be

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absolutely missed. Any small bundles will absolutely be missed.
Q. I'll draw a little example here. So if you had a fiber that was on your slide in the microscope and let's say it was 100 microns long but it was .25 or less microns wide -- so its width is less than .25 and its length is 100 -- would you expect to be able to see that fiber with a light microscope?
A. Probably not. You're right on the edge. But you would be able to see if something is there. But you wouldn't be able to go through the analytical polarization to identify. That's really what we're talking about. It's not so much seeing it. Can we tell what it is.
Q. Okay. All right. And then TEM, transmission electron microscopy -- comparing the magnification abilities of that to light microscope, can you do that?
A. A polarized light microscope, if you're following the protocols, call for about 400 to 500 times. You know, they've got new digital state of the art. We were actually looking at one yesterday that I want so bad because I'm a nerd.
Q. Right.
A. It can go up to 4,000 times. That's a $100,000 optical microscope. The transmission electron microscope, on the other hand, typically we've had microscopes, and still do, that easily go up to a

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million times. So you can start actually seeing the atom structure and the lattices where you can actually see where the atoms are at such high magnification. So it doesn't have any size restriction on what size fiber you can see.
Q. You can go to a million times with an electron microscope?
A. Depending on -- the ones that they have in universities or in Japan, you can go to two, three million times. And then if you just take a picture and go 8 by 10, you add another three or four times on there. We have pictures that are taken at a 6 million magnification.
Q. So when we look through a transmission electron microscope -- these are just some examples -- are these the types of structures that you might see if you're doing an analysis specifically for asbestos?
A. Yes. The only thing we're missing would be what's known as a matrix.
Q. And what is a matrix?
A. Well, if we go to the far left and we see -- see that one fiber there?
Q. Yep.
A. That's a borderline. You would call that a matrix.
Q. Why?
A. Because it's got material around it.
Q. Okay. So like this stuff here and down

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here?
A. Yeah, but really what we see is -- I call it the hairy-ball effect, where you've got something that's -- you have fibers sticking out of it. That's a matrix.
Q. And these are just terms that are used to characterize what the technician sees; is that fair?
A. It's fair. When the counting rules were first being put together, everybody could agree that that's a single fiber.
Q. Uh-huh.
A. Very rarely could you get technicians and analysts, and even me and others, to say exactly how many fibers are in that bundle.
Q. Right.
A. Right. So instead of trying to say, okay, I've got a bundle, but there's really 25 fibers in there, we all agreed -- it's agreed that it's just called a bundle.
Q. So it's --
A. One bundle. And it's a structure. You'll hear "asbestos structures." A fiber is a structure. A bundle is a structure. And then a cluster is also a structure.
Q. Okay. So, for instance, this is -- so it looks like -- I mean in that last example in the cluster, it looks like there's lots of different fibers; right? But if they're overlapping, you just call them

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one structure?
A. If there are two overlapping, that's two.
Q. Okay.
A. If I get a third one in there -- if I had a pointer, I could show you. If you look at the cluster towards the top, you see where we have three intersecting sides?
Q. Like up there there are three. One, two, three?
A. Three. And then we have intersecting sides here. So we would call that one structure on the count sheet.
Q. Even though it might be multiple fibers?
A. Correct.
Q. Now, is this a picture of the scanning electron microscope at MAS, your actual scope?
A. Yes.
Q. Is that your actual Sumo wrestler doll?
A. No, that's not my actual Sumo wrestler doll. When you buy this level of microscope, they give you one of those.
Q. Okay.
A. We won't be collecting a bunch of them.
Q. All right. So this is a scanning electron microscope. And just briefly, what's the difference between a scanning electron microscope and a transmission electron microscope?
A. If we can go back to that photograph?

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Q. Sure.
A. No, the one where we showed the different microscopes.
Q. Oh, sure.
A. So we have a transmission electron microscope. And the T, transmission, means your sample -- it's an electron beam. Optical uses light. And let's pretend the wavelength of light, one photon, is this big, one wave. You can't really see anything smaller than that wavelength of light unless you do some digital enhancement, because that's what we call resolution.
You have to have something smaller, looking at your object, than what the object is. So if this is a wavelength of light -- and I said maybe the best optical microscope, 4,000 times. An electron would fit on the tip of my finger if we scaled it. So we're using electrons -- hence, the name transmission electron microscopes -- to image what we're interested in.
In the transmission, if you go right in the middle, right there -- in the middle of that column, you can see something sticking off to the right-hand side. That's where the sample goes.
So the electron beam comes down the column. We usually run ours at 100,000 volts. It makes the electrons -- a lot of electronic engineering -- it makes it into a nice beam. It goes through our sample that we have sitting in front of it. It's like an X-ray. X-ray

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goes through, and the bone stops the X-rays, and then the tissue, not so much. And you take the photograph of it, and it gives you that.
We're doing just about the same thing here. The fibers stop some of the electrons because of the thickness. And right next to it the electrons freely go through, and that gives you that nice resolution just like that.
We're actually looking at structures inside those fibers. Do you see that contrast difference in the fibers?
Q. Like where they cross over in kind of --
A. If you go to that really long one --
Q. This one?
A. No, over here.
Q. Oh, this right here.
A. And you see the contrast difference through there? That's the crystalline structure of that fiber where we have some defects. And it's causing scatter of the electrons. That's why it's such a valuable tool, is when you have really thin samples, you can see the internal structure.
Q. And how does that compare with an SEM?
A. The SEM is a scanning electron microscope. So doesn't have the beam going through. It scans like a TV. Hence the scanning name. And it rasters very fast, like the old TVs, not the new digital ones. So it scans very fast. So if I had an electron beam scanning over

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my finger, areas where the electrons hit the most are causing the material underneath to eject electrons because of the energy.

We have detectors that see that and know how to map it in space so you get high contrast. Very, very good method for looking at three-dimensional surface features.

Q. Okay. And is this one of the TEMs at MAS?

A. It is.

Q. And here's another one. Just generally, are these different in some way?

A. The one before that is 120,000 volt. That's one of our typical asbestos TEMs because we only go up sometimes 50,000 or 60,000.

The next one is a 200,000 volt. And that's our high-resolution TEM. That one will go up to a million times.

Q. And let me just ask you, because I'm thinking about it. In your lab, before you do a sample, do you do blanks or lab blanks or controls?

A. Yes. When we process the samples, we put a lab blank along with it so that it -- everything happens the same as with the real sample except there's no real sample. Whatever process we have to prepare that sample, we do the exact same thing so we can look for potential contamination in the lab.

Q. And did you do that for the studies we asked you to conduct?

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A. Yes.

Q. Okay. All right. So did you analyze samples of Johnson & Johnson's Baby Powder as well as Shower to Shower?

A. Yes, sir.

Q. And I guess so we can -- really quick, are you here to talk about who owned what mines?

A. No.

Q. Or the geology of mines?

A. I'm not a geologist.

Q. Okay. And are you here to talk about what mines supplied talc to which samples you looked at?

A. No, sir.

Q. What was your purpose in looking at these samples?

A. As a microscopist, I was asked to look at these samples to see if we could detect any amphibole asbestos in the samples. That was our job.

Q. Okay. So just so we can talk about this going forward, we have marked your report as Plaintiffs' Exhibit 1206.

(Plaintiffs' Exhibit 1206 was marked for identification by the judicial assistant.)

MR. PANATIER: Photographs of the product as 1207.

(Plaintiffs' Exhibit 1207 was marked for identification by the judicial assistant.)

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MR. PANATIER: So that's those two.

Q. Did you do what's called a size-distribution analysis?

A. Yes.

MR. PANATIER: And we're going to mark that as Exhibit 1208.

(Plaintiffs' Exhibit 1208 was marked for identification by the judicial assistant.)

Q. BY MR. PANATIER: And then did you do quality control analysis?

A. Yes.

MR. PANATIER: We'll mark that as 1208-A.

(Plaintiffs' Exhibit 1208-A was marked for identification by the judicial assistant.)

MR. PANATIER: There you go.

Q. All right. So I think that's all of the documentation your lab provided to us. And I will -- I'm going to give you a big report called Backup Data if you need to refer to it. Okay?

A. Okay.

Q. All right. So first of all, did you have a methodology that you followed to prepare the samples?

A. Yes.

Q. Okay. And this is a picture of an article "Amphibole content of cosmetic and pharmaceutical talcs," by A.M. Blount.

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Is this the methodology that you followed?

A. Yes, sir.

Q. Now, there's a preparation methodology. That's what this says. Can you please explain your preparation methodology and why you chose this methodology to prepare the samples.

A. The preparation methodology is -- essentially you start with the sample of talc, and you can either take that, suspended it in water or what have you, filter it onto a filter, and then prepare it for transmission electron microscopy.

When you do that, you're not only -- if, by chance, there is detectable asbestos in there, you're not only getting that on the filter, you're getting all the talc. And there is so much more talc than asbestos, we have to dilute the samples so it doesn't cover up the grids so badly that you can't see through them or analyze what's under them.

Or you can use the Blount method in which, instead of putting it just in water, you put it in what's known as a heavy liquid. And what "heavy liquid" means is it has certain densities. And densities is the amount of atoms per mass.

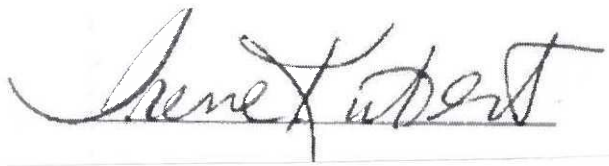
So if I have a heavy liquid that has a density of 2.85 grams per cubic foot centimeter and I want to find tremolite that has a density of 3.1 to 3.2 grams per centimeter, it's heavier than that density liquid. Talc, on the other hand, has a density of 2.6.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
DEPARTMENT NER HON. C. EDWARD SIMPSON, JUDGE

LAOSD ASBESTOS CASES, Coordinated Proceeding Special Title (Rule 3.550)	No. JCCP 4674
TINA HERFORD and DOUGLAS HERFORD, Plaintiffs, vs. AT&T CORP., a subsidiary of AT&T INC. and its subsidiary PACIFIC BELL TELEPHONE COMPANY, et al., Defendants.	No. BC646315

I, IRENE KUBERT, CSR No. 10105, Official Reporter Pro Tempore of the Superior Court of the State of California, for the County of Los Angeles, do hereby certify that the foregoing pages, 1274 through 1392 , comprise a full, true, and correct transcript of the proceedings and testimony taken in the matter of the above-entitled cause on October 25, 2017.

Dated this 25th day of October, 2017.



IRENE KUBERT, RMR, CRR, CLR
Official Reporter Pro Tempore, CSR No. 10105